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Attorneys for MidFirst Bank

IN THE MATTER OF:

Nicholas J Hitchner

Randy R Hitchner aka Randy R Snyder

DEBTOR(S),

**IN THE UNITED STATES BANKRUPTCY  
COURT FOR THE DISTRICT OF NEW  
JERSEY**

CHAPTER 13  
CASE NO. 18-23836 ABA

**STATEMENT AS TO WHY NO BRIEF IS  
NECESSARY IN ACCORDANCE WITH  
“LOCAL RULES OF BANKRUPTCY  
PRACTICE” RULE 3(C)**

The within Notice of Motion requests relief from the automatic stay on the grounds, as set forth on the accompanying Certification, that the debtor(s) have failed to maintain their monthly mortgage payments to the Secured Creditor.

As the facts the secured creditor relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion.

DATED: June 02, 2023

**/s/ Denise Carlon**

Denise Carlon, Esquire

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